

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JEREMY ROTHE-KUSHEL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:18-cv-319-BP
)	
JEWISH COMMUNITY FOUNDATION)	
OF GREATER KANSAS CITY, et al.,)	
)	
Defendants.)	

AMENDED MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

COMES NOW Plaintiff Jeremy Rothe-Kushel, by counsel, and as permitted by FED. R. CIV. P. 15(a)(2) hereby moves this Court for its Order granting him leave to file his First Amended Complaint. Plaintiff's proposed First Amended Complaint does not add any new claims. It does, however, add allegations of fact that support existing claims that result from evidence gathered during the discovery conducted to date. That evidence supports adding two new parties as to certain claims. Evidence gathered during discovery also supports again lodging claims against two parties that were previously dismissed. The proposed amended complaint also drops Defendant Sergeant Michael Satter as a party as to all claims.¹

In support of this motion, Plaintiff refers the Court to his Suggestions in Support of Amended Motion for Leave to File First Amended Complaint, filed contemporaneously and

¹Satter's counsel has consented to the dismissal of claims against Satter and it is anticipated that a Stipulation to Dismissal of Defendant Satter will be filed on February 27 or 28, 2019.

incorporated herein by this reference. A copy of the proposed First Amended Complaint is submitted as Exhibit 1 hereto.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was filed and served via the Court's electronic filing system on counsel listed below and to Ms. Cook via electronic mail this 26th day of February, 2019:

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